

EXHIBIT 89

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PIONEER BUSINESS SERVICES, LLC
D/B/A FOUR CORNERS AVIATION
SERVICES,,

Plaintiff,

v. Case No.
1:22cv6206

·VISTAJET US, INC.,

Defendant.

REMOTE VIDEOTAPED DEPOSITION OF

THOMAS FLOHR

February 22, 2023

Reported by:
Bonnie Pruszynski, RMR, CA CSR No. 13064
Job No. 222339

1 T. Flohr

2 all over it." Then you write in -- there are
3 three balloons from you after that. The
4 first one says: "They are not going to ruin
5 what we built."

6 What was FCA doing that was going
7 to ruin what you had built?

8 A. They were -- they were using my
9 brand, and they were disclosing sensitive
10 pricing information, and that ruins the
11 confidentiality of my entire worldwide
12 pricing structure.

13 Q. Are you aware of any document where
14 FCA disclosed the information about what FCA
15 paid to SoftBank and to VistaJet for those
16 hours?

17 A. I don't recall that.

18 Q. Are you aware of FCA saying in any
19 of its documents the price that VistaJet
20 charged its other customers?

21 A. I don't recall that.

22 Q. And in fact, the only information
23 FCA disclosed was the price that FCA was
24 charging; correct?

25 A. What is the question?

C E R T I F I C A T E

I, Bonnie Pruszyński, RPR, RMR, do hereby certify that on February 22, 2023, appeared before me, THOMAS FLOHR.

I further certify that the said witness was first duly sworn to testify to the truth in the cause aforesaid.

I further certify that the signature of the witness to the foregoing deposition was not specified by counsel.

I further certify that I am not counsel for nor in any way related to any of the parties to this suit, nor financially interested in the action.

IN WITNESS WHEREOF, I have hereunto set my hand this 1st of March, 2023.



Bonnie Pruszyński